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April 2, 2024

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VIA ECF

The Hon. Judge Ramon E. Reyes, Jr.
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201
Courtroom: 2E North

Re: *Mandel v. Daskal et al.*, No. 1:23-cv-07352 (RER) (VMS): Joint Proposed Briefing
Schedule for Motion to Dismiss

Your Honor:

We represent Defendants Rabbi Ben Zion Halberstam and Chaim S. Halberstam (the “Halberstam Defendants”) in the above-captioned action. Pursuant to the Court’s March 27, 2024 order, we have conferred with counsel for Defendants Congregation Shaarei Zion of Bobov, Rabbinical College Bobover Yeshiva Bnei Zion, Yad Ephraim, Pesach Greenberg, Yachad D’Bobov, and Chaim Fleischer (the “Congregation Defendants”) regarding a briefing schedule for Defendants’ anticipated motions to dismiss this action. Counsel for Jacob Daskal (“Defendant Daskal” and, together with the Halberstam Defendants and Congregation Defendants, “Moving Defendants”) has also sought a pre-motion conference for an intended motion to dismiss this action, *see* ECF No. 48, and has also indicated approval of the below schedule to the extent consistent with the Court’s disposition of his conference request.

Counsel for Plaintiff has indicated that he also agrees with the below proposed briefing schedule.

- On or before **May 24, 2024**, Moving Defendants shall serve their motions to dismiss and any supporting papers on all parties and file a copy of their cover letters via ECF in accordance with the Court’s Individual Practice Rule IV.B.3(a);
- On or before **June 28, 2024**, Plaintiff shall serve her reply to Moving Defendants’ motions to dismiss and any supporting papers on all parties and file a copy of her cover letter via ECF in accordance with the Court’s Individual Practice Rule IV.B.3(b);
- On or before **July 26, 2024**, Moving Defendants shall serve their replies in further support of their motions to dismiss on all parties and file all moving papers, opposition



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papers, and reply papers on ECF in accordance with the Court's "bundling rule," Individual Practice Rule IV.B.3(c).

We respectfully request that the Court enter an order adopting the briefing schedule above.

Respectfully submitted,

Andrew J. Levander

Cc: All counsel of record via ECF